

BLANK ROME LLP  
Attorneys for Defendant  
COSCO BEIJING INTERNATIONAL  
FREIGHT CO., LTD.  
LeRoy Lambert (LL-3519)  
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UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

**MED-ASIA SHIPPING LTD.,**

Plaintiff,

-against-

COSCO BEIJING INTERNATIONAL  
FREIGHT CO., LTD.,

Defendant.

07 Civ. 9624 (RMB)

**AFFIDAVIT OF LEROY LAMBERT**

STATE OF NEW YORK     )  
                              )  
COUNTY OF NEW YORK )

**SS:**

LEROY LAMBERT, being duly sworn, deposes and says:

1. I am a member of the Bar of this State and Court and a partner in the law firm of Blank Rome LLP, attorneys for Defendant COSCO BEIJING INTERNATIONAL FREIGHT CO., LTD.

2. I annex as Exhibit 1 a copy of Plaintiff's complaint dated October 30, 2007

3. I annex as Exhibit 2 this Court's Order of Attachment dated October 30, 2007.

4. I annex as Exhibit 3 a copy of a fax dated January 11, 2008, from Blank Rome Hong Kong, attorneys in Hong Kong, to Dibb Lupton Alsop ("DLA"), attorneys in Hong Kong for Plaintiff.

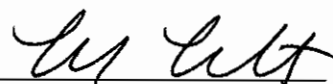
5. I annex as Exhibit 4 defendant's Answer and Counterclaim dated January 14, 2008.

6. I annex as Exhibit 5 the Declaration of Jose-Antonio Maurellet dated January 21, 2008.

7. I understand that transfers totalling \$74,828.89 have been attached as a result of the Order of Attachment and that this amount is being held by one or more banks in New York.

8. I annex as Exhibit 6 a copy of an Escrow Agreement between Blank Rome and Defendant. I am advised that Defendant has submitted this Escrow Agreement to the relevant financial authorities in China with the request that the amount of \$315,094.65 be transmitted to Blank Rome's trust account in New York to be held pending further order of the Court.

9. As of February 6, 2008, DLA has not responded to Exhibit 3 and has not commenced arbitration or litigation in Hong Kong or anywhere else on the merits of this claim.

  
LeRoy Lambert (LL-3519)

Sworn to before me this  
7th day of February, 2008

  
Notary Public

KARL V. REDA  
Notary Public, State of New York  
No. 30-4783126, Qual. in Nassau Cty.  
Certificate Filed in New York County  
Commission Expires Nov. 30, 2009